



Your business
is our business.

REDACTED - FOR PUBLIC INSPECTION

7852 Walker Drive, Suite 200
Greenbelt, Maryland 20770
phone: 301-459-7590, fax: 301-577-5575
internet: www.jsitel.com, e-mail: jsitel@jsitel.com

June 29, 2015

Accepted / Filed

Via Hand Delivery

Marlene H. Dortch, Secretary
Federal Communications Commission
Office of the Secretary
445 12th Street, SW
Washington, DC 20554

JUN 29 2015

Federal Communications Commission
Office of the Secretary

Re: **WC Docket No. 14-58**
2015 ETC Annual Report of Vermont Telephone Company, Inc.
Study Area Code 147332

Dear Ms. Dortch:

On behalf of Vermont Telephone Company, Inc. ("Vermont"), JSI files the attached confidential and redacted versions of the FCC Form 481 ETC annual reporting information pursuant to sections 54.313 and 54.422 of the Commission's rules.¹ Vermont seeks confidential treatment under Protective Order for section 54.313(f)(2) financial information.² The redacted version is also being filed this date via the FCC's Electronic Comment Filing System. In addition, attached is a letter requesting confidential treatment under Sections 0.457 and 0.459 of its Progress Report on its Five-Year Service Quality Improvement Plan as required by Section 54.313(a)(1).³

Please direct any questions regarding the filing to the undersigned.

Sincerely,

John Kuykendall
JSI Vice President
301-459-7590
jkuykendall@jsitel.com

cc: Charles Tyler, Telecommunications Access Policy Division (two copies, confidential)

No. of Copies rec'd 043
List ABCDE

¹ 47 C.F.R. §§ 54.313, 54.422.

² *Connect America Fund et al.*, WC Docket No. 10-90 *et al.*, Protective Order, DA 15-712 rel. June 17, 2015 (Protective Order). 47 C.F.R. § 54.313(f)(2).

³ 47 C.F.R. §§ 0.457, 0.459, 54.313(a)(1).

Echelon Building II, Suite 200
9430 Research Blvd., Austin, TX 78759
phone: 512-338-0473, fax: 512-346-0822

Eagandale Corporate Center, Suite 310
1380 Corporate Center Curve, Eagan, MN 55121
phone: 651-452-2660, fax: 651-452-1909

6849 Peachtree Dunwoody Road
Bldg. B-3, Suite 200, Atlanta, GA 30328
phone: 770-569-2105, fax: 770-410-1608

547 South Oakview Lane
Bountiful, UT 84010
phone: 801-294-4576, fax: 801-294-5124



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June 29, 2015

Accepted / Filed

JUN 29 2015

Marlene H. Dortch, Secretary
Federal Communications Commission
Office of the Secretary
445 12th Street, SW
Washington, DC 20554

Federal Communications Commission
Office of the Secretary

Re: **WC Docket No. 14-58**
2015 ETC Annual Report of Vermont Telephone Company, Inc.
Study Area Code 147332
Request for Confidentiality

Dear Ms. Dortch:

John Staurulakis, Inc. ("JSI"), on behalf of its client Vermont Telephone Company, Inc. ("Company") hereby requests, pursuant to Sections 0.457 and 0.459 of the Commission's rules,¹ withholding from public inspection certain information contained in an attachment to the above referenced reporting requirement. The Company provides the following in support of its request, numbered consistent with the subparagraphs of Section 0.459(b).²

1. The information for which the Company is seeking confidential treatment is an attachment to the Company's annual reporting information pursuant to Sections 54.313 and 54.422 of the Commission's rules ("Report").³
2. Pursuant to Section 54.313(a)(1), Rate-of-Return Eligible Telecommunications Carriers ("ETCs") must file with the Commission a Progress Report on its Five-Year Service Quality Improvement Plan ("Progress Report") which is contained in the attachment to the 2015 Report.⁴
3. The information contained in attachment for which the Company seeks the withholding from public inspection is the entirety of data pertaining to the Company's Five-Year Plan provided at FCC Form 481 Line 112 attachment. Information of this nature is confidential commercial information routinely withheld from public inspection.

¹ 47 C.F.R. §§ 0.457, 0.459.

² 47 C.F.R. § 0.459(b)(1) through (9).

³ 47 C.F.R. §§ 54.313, 54.422.

⁴ 47 C.F.R. §§ 54.313(a)(1).

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547 South Oakview Lane
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phone: 801-294-4576, fax: 801-294-5124

4. With respect to identifying the degree to which the subject attachment concerns a service that is subject to competition, the information is of a financial and competitive nature regarding the provision of telecommunications services. The Line 112 attachment contains competitively sensitive information related to proposed improvements or upgrades and maintenance the Company's network.

In its *March 5, 2013 Order*, the FCC. The FCC specified that for rate-of-return carriers, the five-year plans "should describe the carrier's network improvement plan, which should provide greater visibility into current plans to extend broadband service to unserved locations in rate-of-return service territories."⁵ The Company's Progress Report updates this information as well as provides maps and detailed information as to whether or not network improvement objectives were achieved at the wire center level. Accordingly, because the Company is a rate-of-return carrier, it must file Progress Reports which contain proprietary, competitively sensitive information related to the Company's existing network including the specific locations of customers as well as describe proposed improvements or upgrades and maintenance of its network throughout its service area. Specifically, this information sets forth services provided by the Company over its existing network including specific locations of customers as well as planned network improvement and maintenance for the years 2015 through 2019 including project start and completion dates, population that will be impacted by the improvements and upgrades at the wire center level and projected capital costs associated with the improvements and upgrades and operating costs associated with maintaining the network including depreciation for investments that have already been made. As such, this information contains competitively sensitive information related to the Company's existing network as well as detailed plans at the wire center level for network upgrades and maintenance projected for the years 2015 through 2019.

5. With respect to identifying possible exposure to competitive harm, the information contained in the Line 112 attachment is information that is not customarily released to the public. This information is proprietary to the Company, is unique to the Company's serving territory and is only known to the Company and its authorized agents. If the Information is not protected, it would have economic value to potential competitors who would be able to target their marketing to specific customers. In a competitive telecommunications marketplace, this type of information is highly sensitive. If publicly disclosed, it would enable competitors to craft business plans that capitalize on their knowledge of the locations of the Company's customers which would place the Company at a competitive disadvantage.

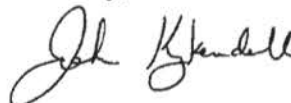
⁵ See *Connect America Fund et al.*, WC Docket 10-90 *et al.*, Order, DA 13-332 (rel. Mar. 5, 2013) ("*March 5, 2013 Order*") at para 9 citing Section 54.202(a) (1) (ii).

6. With respect to steps the Company has taken to ensure against unauthorized disclosure of the information contained in the attachment, the Company is filing the attachment under seal. The Company uses the information contained in the Five-Year Plan to ensure that its customers continue to receive state-of-the-art high quality telecommunications and broadband services that the Company has been providing to them for many years as well as to satisfy mandatory reporting requirements and does not share the information for which protection is sought. The Company protects the secrecy of this information with a security protocol that ensures the information is not inadvertently disclosed or disseminated. Only directors, managers and employees with a direct need to know are authorized to access the information.
7. Any previous versions of this information are not publicly available.
8. Because the information is not routinely available, a need exists for maintaining the confidentiality of this information permanently.
9. Not applicable.

Based on the preceding, JSI respectfully requests on behalf of the Company that the Commission grant confidential treatment under Section 0.459 to Company's Five-Year Plan provided at FCC Form 481 Line 112 attachment.

Please contact the undersigned with any questions regarding this request.

Sincerely,



John Kuykendall
JSI Vice President
301-459-7590
jkuykendall@jsitel.com

<010> Study Area Code	147332	
<015> Study Area Name	VERMONT TEL. CO-VT	Accepted / Filed
<020> Program Year	2016	
<030> Contact Name: Person USAC should contact with questions about this data	Shannon Butler	JUN 29 2015
<035> Contact Telephone Number: Number of the person identified in data line <030>	8028857707 ext.	Federal Communications Commission Office of the Secretary
<039> Contact Email Address: Email of the person identified in data line <030>	sbutler@vermontel.com	

ANNUAL REPORTING FOR ALL CARRIERS		54-213 Completion Required	54-422 Completion Required
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<100> Service Quality Improvement Reporting	(complete attached worksheet)	(check box when complete)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<200> Outage Reporting (voice)	(complete attached worksheet)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<210> <input checked="" type="checkbox"/> <-- check box if no outages to report		<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<300> Unfulfilled Service Requests (voice)	0	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<310> Detail on Attempts (voice)	(attach descriptive document)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<320> Unfulfilled Service Requests (broadband)	0	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<330> Detail on Attempts (broadband)	(attach descriptive document)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<400> Number of Complaints per 1,000 customers (voice)		<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<410> Fixed	0.375	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<420> Mobile	0.0	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<430> Number of Complaints per 1,000 customers (broadband)		<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<440> Fixed	0.0	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<450> Mobile	0.0	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<500> Service Quality Standards & Consumer Protection Rules Compliance	(check to indicate certification)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<510> 147332VT510.pdf	(attached descriptive document)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<600> Functionality in Emergency Situations	(check to indicate certification)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<610> 147332VT610.pdf	(attached descriptive document)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<700> Company Price Offerings (voice)	(complete attached worksheet)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<710> Company Price Offerings (broadband)	(complete attached worksheet)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<800> Operating Companies and Affiliates	(complete attached worksheet)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<900> Tribal Land Offerings (Y/N)?	(if yes, complete attached worksheet)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<1000> Voice Services Rate Comparability Certification	Yes	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<1010>	(attach descriptive document)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<1100> Certify whether terrestrial backhaul options exist (Yes or No)	(if not, check to indicate certification)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<1110>	(complete attached worksheet)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<1200> Terms and Condition for Lifeline Customers	(complete attached worksheet)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>

Price Cap Carriers, Proceed to Price Cap Additional Documentation Worksheet

Including Rate-of-Return Carriers affiliated with Price Cap Local Exchange Carriers

<2000>	(check to indicate certification)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<2005>	(complete attached worksheet)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Rate of Return Carriers, Proceed to ROR Additional Documentation Worksheet			
<3000>	(check to indicate certification)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<3005>	(complete attached worksheet)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>

(100) Service Quality Improvement Reporting
Data Collection Form

FCC Form 481

OMB Control No. 3060-0986/OMB Control No. 3060-0819

July 2013

<010>	Study Area Code	147332
<015>	Study Area Name	VERMONT TEL. CO-VT
<020>	Program Year	2016
<030>	Contact Name - Person USAC should contact regarding this data	Shannon Butler
<035>	Contact Telephone Number - Number of person identified in data line <030>	8028857707 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	sbutler@vermontel.com

<110> Has your company received its ETC certification from the FCC? (yes / no) ☐ ☒

If your answer to Line <110> is yes, do you have an existing §54.202(a) "5

<111> year plan" filed with the FCC? (yes / no) ☐ ☐

If your answer to Line <111> is yes, then you are required to file a progress report, on line <112> delineating the status of your company's existing § 54.202(a) "5 year plan" on file with the FCC, as it relates to your provision of voice telephony service.

<112> Attach Five-Year Service Quality Improvement Plan or, in subsequent years, your annual progress report filed pursuant to 47 C.F.R. § 54.313(a)(1). If your company is a CETC which only receives frozen support, your progress report is only required to address voice telephony service.

147332VT112.pdf

Name of Attached Document

Please select the appropriate responses below (Yes, No, Not Applicable) to confirm that the attached document(s), on line 112, contains a progress report on its five-year service quality improvement plan pursuant to §54.202(a). The information shall be submitted at the wire center level or census block as appropriate.

- <113> Maps detailing progress towards meeting plan targets
- <114> Report how much universal service (USF) support was received
- <115> How much (USF) was used to improve service quality and how support was used to improve service quality
- <116> How much (USF) was used to improve service coverage and how support was used to improve service coverage
- <117> How much (USF) was used to improve service capacity and how support was used to improve service capacity
- <118> Provide an explanation of network improvement targets not met in the prior calendar year.

Yes
Yes
Yes
Yes
Yes
Not Applicable

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(200) Service Outage Reporting (Voice)
Data Collection Form

FCC Form 481

OMB Control No. 3060-0986/OMB Control No. 3060-0819
July 2013

<010>	Study Area Code	147332
-------	-----------------	--------

<015>	Study Area Name	VERMONT TEL. CO-VT
-------	-----------------	--------------------

<020>	Program Year	2016
-------	--------------	------

<030>	Contact Name - Person USAC should contact regarding this data	Shannon Butler
-------	---------------------------------------------------------------	----------------

<035> Contact Telephone Number - Number of person identified in data line <030> 8028857707 ext.

<039> Contact Email Address - Email Address of person identified in data line <030> sbutler@vermontel.com

<220> <a> <b1> <b2> <b3> <b4> <c1> <c2> <d> <e> <f> <g> <h>

[illegible]

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(700) Price Offerings Including Voice Rate Data
Data Collection Form

FGC Form 481

QMS Control No. 3060-0886/QMS Control No. 3060-0819
July 2013

<010>	Study Area Code	147332
<015>	Study Area Name	VERMONT TEL. CO-VT
<020>	Program Year	2016
<030>	Contact Name - Person USAC should contact regarding this data	Shannon Butler
<035>	Contact Telephone Number - Number of person identified in data line <030>	8028857707 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	sbutler@vermontel.com

<701> Residential Local Service Charge Effective Date
<702> Single State-wide Residential Local Service Charge

1/1/2015

[illegible]

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(710) Broadband Price Offerings
Data Collection Form

FCC Form 481
OMB Control No. 3060-0586 / OMB Control No. 3060-0815
July 2013

<010>	Study Area Code	147332
<015>	Study Area Name	VERMONT TEL. CO-VT
<020>	Program Year	2016
<030>	Contact Name - Person USAC should contact regarding this data	Shannon Butler
<035>	Contact Telephone Number - Number of person identified in data line <030>	8028857707 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	sbutler@vermontel.com

[illegible]

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(800) Operating Companies
Data Collection Form

FCC Form 481
OMB Control No. 3060-0986/OMB Control No. 3060-0819
July 2013

<010>	Study Area Code	147332
<015>	Study Area Name	VERMONT TEL. CO-VT
<020>	Program Year	2016
<030>	Contact Name - Person USAC should contact regarding this data	Shannon Butler
<035>	Contact Telephone Number - Number of person identified in data line <030>	8028857707 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	sbutler@vermontel.com
<810>	Reporting Carrier	Vermont Telephone Company, Inc.
<811>	Holding Company	Vermont National Telephone Company, Inc.
<812>	Operating Company	Vermont Telephone Company, Inc.

<813>	<81>	<82>	<83>
	Affiliates	SAC	Doing Business As Company or Brand Designation

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(900) Tribal Lands Reporting Data Collection Form	FCC Form 431 OMB Control No. 3060-0585/OMB Control No. 3060-0819 July 2013
--------------------------------------------------------------------	----------------------------------------------------------------------------------

<010>	Study Area Code	147332
<015>	Study Area Name	VERMONT TEL. CO-VT
<020>	Program Year	2016
<030>	Contact Name - Person USAC should contact regarding this data	Shannon Butler
<035>	Contact Telephone Number - Number of person identified in data line <030>	8028857707 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	abutler@vermontel.com

<910> Tribal Land(s) on which ETC Serves

--

<920> Tribal Government Engagement Obligation

[illegible]

Name of Attached Document

If your company serves Tribal lands, please select (Yes, No, NA) for each these boxes to confirm the status described on the attached document(s), on line 920, demonstrates coordination with the Tribal government pursuant to § 54.313(a)(9) includes:

- <921> Needs assessment and deployment planning with a focus on Tribal community anchor institutions.
- <922> Feasibility and sustainability planning;
- <923> Marketing services in a culturally sensitive manner;
- <924> Compliance with Rights of way processes
- <925> Compliance with Land Use permitting requirements
- <926> Compliance with Facilities Siting rules
- <927> Compliance with Environmental Review processes
- <928> Compliance with Cultural Preservation review processes
- <929> Compliance with Tribal Business and Licensing requirements.

[illegible]

**(1100) No Terrestrial Backhaul Reporting
Data Collection Form**

FCG Form 481

OMB Control No. 3060-0986/OMB Control No. 3060-0819

July 2013

<010>	Study Area Code	147332
<015>	Study Area Name	VERMONT TEL. CO-VT
<020>	Program Year	2016
<030>	Contact Name - Person USAC should contact regarding this data	Shannon Butler
<035>	Contact Telephone Number - Number of person identified in data line <030>	8028857707 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	sbutler@vermontel.com

<1120> Please confirm whether terrestrial backhaul options exist within the supported area pursuant to § 54.313(g) (Yes, No).

<1130> Please select the appropriate response (Yes, No, Not Applicable) to confirm the reporting carrier offers broadband service of at least 1 Mbps downstream and 256 kbps upstream within the supported area pursuant to § 54.313(g).

(1200) Terms and Condition for Lifeline Customers
Lifeline
Data Collection Form

FCC Form 481
 OMB Control No. 3060-0986/OMB Control No. 3060-0819
 July 2013

<010>	Study Area Code	147332
<015>	Study Area Name	VERMONT TEL. CO-VT
<020>	Program Year	2016
<030>	Contact Name - Person USAC should contact regarding this data	Shannon Butler
<035>	Contact Telephone Number - Number of person identified in data line <030>	8028857707 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	sbutler@vermontel.com

<1210> Terms & Conditions of Voice Telephony Lifeline Plans

147332VT1210.pdf

Name of Attached Document

<1220> Link to Public Website

HTTP

"Please check these boxes below to confirm that the attached document(s), on line 1210, or the website listed, on line 1220, contains the required information pursuant to § 54.422(a)(2) annual reporting for ETCs receiving low-income support, carriers must annually report:

- <1221> Information describing the terms and conditions of any voice telephony service plans offered to Lifeline subscribers, ☒
- <1222> Details on the number of minutes provided as part of the plan, ☒
- <1223> Additional charges for toll calls, and rates for each such plan. ☒

(2000) Price Cap Carrier Additional Documentation

Data Collection Form

Including Rate-of-Return Carriers affiliated with Price Cap Local Exchange Carriers

PCC Form 481

OMB Control No. 3060-0086/OMB Control No. 3060-0819

July 2013

<010>	Study Area Code	147532
<015>	Study Area Name	VERMONT TEL. CO-VT
<020>	Program Year	2016
<030>	Contact Name - Person USAC should contact regarding this data	Shannon Butler
<035>	Contact Telephone Number - Number of person identified in data line <030>	8028897707 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	sbutter@vermontel.com

Select the appropriate responses below (Yes, No, Not Applicable) to note compliance as a recipient of Incremental Connect America Phase I support, frozen High Cost support, High Cost support to offset access charge reductions, and Connect America Phase II support as set forth in 47 CFR § 54.313(b),(c),(d),(e). The information reported on this form and in the documents attached below is accurate.

Incremental Connect America Phase I reporting

- <2010> 2nd Year Certification (47 CFR § 54.313(b)(1)i)
- <2011a> 3rd Year Certification (47 CFR § 54.313(b)(1)iii)
- <2011b> Attachment (47 CFR § 54.313(b)(1)ii)

Name of Attached Document(s) Listing Required Information

Price Cap Carrier Receiving Frozen Support Certification (47 CFR § 54.312(a))

- <2012> 2013 Frozen Support Calculation (47 CFR § 54.313(c)(1))
- <2013> 2014 Frozen Support Calculation (47 CFR § 54.313(c)(2))
- <2014> 2015 Frozen Support Calculation (47 CFR § 54.313(c)(3))
- <2015> 2016 and future Frozen Support Calculation (47 CFR § 54.313(c)(4))

Price Cap Carrier Connect America ICC Support (47 CFR § 54.313(d))

- <2016> Certification Support Used to Build Broadband

Connect America Phase II Reporting (47 CFR § 54.313(e))

- <2017> 3rd year Broadband Service Certification
- <2018> 5th year Broadband Service Certification
- <2019> Interim Progress Certification
- <2020> Please check the box to confirm that the attached document(s), on line 2021, contains the required information pursuant to § 54.313 (e)(3)(ii), as a recipient of CAF Phase II support shall provide the number, names, and addresses of community anchor institutions to which began providing access to broadband service in the preceding calendar year.

- <2021> Interim Progress Community Anchor Institutions

Name of Attached Document(s) Listing Required Information

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PG Form 481
OMB Control No. 3045-0047
May 2013

(b)(6) Release of Information Carrier Additional Documentation

Data Collection Form

<010> Study Area Code	147332
<015> Study Area Name	VERMONT TEL. CO.-VT
<020> Program Year	2016
<030> Contact Name - Person USAC should contact regarding this data	Shannon Butler
<030> Contact Telephone Number - Number of person identified in data line <030>	8028857707 ext.
<035> Contact Email Address - Email Address of person identified in data line <030>	about@vermontel.com

CHECK the boxes below to note compliance on its five year service quality plan (pursuant to 47 CFR § 54.313(f)(2)) and, for privately held carriers, ensuring compliance with the financial reporting requirements set forth in 47 CFR § 54.313(f)(2). I further certify that the information reported on this form and in the documents attached below is accurate.

147332VT3010.pdf	Name of Attached Document Listing Required Information
------------------	--------------------------------------------------------

(3010) Progress Report on 5 Year Plan
Milestone Certification (47 CFR § 54.313(f)(1)(i))

Please check this box to confirm that the attached document(s), on line 3012 contains the required information pursuant to § 54.313 (f)(1)(i), the carrier shall provide the number, names, and addresses of community anchor institutions to which began providing access to broadband service in the preceding calendar year.



147332VT3012.pdf	Name of Attached Document Listing Required Information
------------------	--------------------------------------------------------

(3012) Community Anchor Institutions (47 CFR § 54.313(f)(1)(ii))

(3013) Is your company a Privately Held ROR Carrier (47 CFR § 54.313(f)(2))

(3014) If yes, does your company file the RUS annual report



Please check these boxes to confirm that the attached document(s), on line 3017, contains the required information pursuant to § 54.313(f)(2) compliance requires:

(3015) Electronic copy of their annual RUS reports (Operating Report for Telecommunications Borrowers)



(3016) Document(s) for Balance Sheet, Income Statement and Statement of Cash Flows



147332VT3017.pdf	Name of Attached Document Listing Required Information
------------------	--------------------------------------------------------

(3017) If the response is yes on line 3014, attach your company's RUS annual report and all required documentation



(3018) If the response is no on line 3014, is your company audited?

If the response is yes on line 3018, please check the boxes below to confirm your submission, on line 3025 pursuant to § 54.313(f)(2), contains

(3019) Either a copy of their audited financial statement; or (2) a financial report in a format comparable to RUS Operating Report for Telecommunications



(3020) Document(s) for Balance Sheet, Income Statement and Statement of Cash Flows



(3021) Management letter and audit opinion issued by the independent certified public accountant that performed the company's financial audit



If the response is no on line 3018, please check the boxes below to confirm your submission, on line 3025 pursuant to § 54.313(f)(2), contains:

(3022) Copy of their financial statement which has been subject to review by an independent certified public accountant; or (2) a financial report in a format comparable to RUS Operating Report for Telecommunications Borrowers,



(3023) Underlying information subjected to a review by an independent certified public accountant



(3024) Underlying information subjected to an officer certification.



(3025) Document(s) for Balance Sheet, Income Statement and Statement of Cash Flows



(3026) Attach the worksheet listing required information

	Name of Attached Document Listing Required Information
--	--------------------------------------------------------

(3000) Rate Of Return Carrier Additional Documentation (Continued)

FCC Form 481

Data Collection Form

Data Collection No. 3000-0001/Order Control No. 3000-0001
July 2013

<010> Study Area Code	147332
<015> Study Area Name	VERMONT TEL. CO-VT
<020> Program Year	2016
<030> Contact Name - Person USAC should contact regarding this data	Shannon Butler
<035> Contact Telephone Number - Number of person identified in data line <030>	8028857707 ext.
<039> Contact Email Address - Email Address of person identified in data line <030>	sbutler@vermontel.com

Financial Data Summary

(3027) Revenue

(3028) Operating Expenses

(3029) Net Income

(3030) Telephone Plant In Service(TPIS)

(3031) Total Assets

(3032) Total Debt

(3033) Total Equity

(3034) Dividends

REDACTED FOR PUBLIC INSPECTION

Certification - Reporting Carrier Data Collection Form	FCC Form 483 OMB Control No. 3060-0045/OMB Control No. 3060-0019 July 2015
-----------------------------------------------------------	----------------------------------------------------------------------------------

<010> Study Area Code	147332
<015> Study Area Name	VERMONT TEL. CO-VT
<020> Program Year	2016
<030> Contact Name - Person USAC should contact regarding this data	Shannon Butler
<035> Contact Telephone Number - Number of person identified in data line <030>	8028857707 ext.
<039> Contact Email Address - Email Address of person identified in data line <030>	sbutler@vermontel.com

TO BE COMPLETED BY THE REPORTING CARRIER, IF THE REPORTING CARRIER IS FILING ANNUAL REPORTING ON ITS OWN BEHALF:

Certification of Officer as to the Accuracy of the Data Reported for the Annual Reporting for CAF or LI Recipients	
I certify that I am an officer of the reporting carrier; my responsibilities include ensuring the accuracy of the annual reporting requirements for universal service support recipients; and, to the best of my knowledge, the information reported on this form and in any attachments is accurate.	
Name of Reporting Carrier:	
Signature of Authorized Officer: *	Date
Printed name of Authorized Officer:	
Title or position of Authorized Officer:	
Telephone number of Authorized Officer:	
Study Area Code of Reporting Carrier:	Filing Due Date for this form:
Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.	

Certification - Agent / Carrier Data Collection Form	FCC Form 481 OMB Control No. 3080-0548/DAB Control No. 3060-0819 July 2012
-----------------------------------------------------------------	-------------------------------------------------------------------------------------------

<010> Study Area Code	147332
<015> Study Area Name	VERMONT TEL. CO-VT
<020> Program Year	2016
<030> Contact Name - Person USAC should contact regarding this data	Shannon Butler
<035> Contact Telephone Number - Number of person identified in data line <030>	8028857707 ext.
<039> Contact Email Address - Email Address of person identified in data line <030>	sbutler@vermontel.com

TO BE COMPLETED BY THE REPORTING CARRIER, IF AN AGENT IS FILING ANNUAL REPORTS ON THE CARRIER'S BEHALF:

Certification of Officer to Authorize an Agent to File Annual Reports for CAF or LI Recipients on Behalf of Reporting Carrier	
I certify that (Name of Agent) <u>JSI</u> is authorized to submit the information reported on behalf of the reporting carrier. I also certify that I am an officer of the reporting carrier; my responsibilities include ensuring the accuracy of the annual data reporting requirements provided to the authorized agent; and, to the best of my knowledge, the reports and data provided to the authorized agent is accurate.	
Name of Authorized Agent:	JSI
Name of Reporting Carrier:	VERMONT TEL. CO-VT
Signature of Authorized Officer:	CERTIFIED ONLINE Date: 06/26/2015
Printed name of Authorized Officer:	FRANCES STOCKER
Title or position of Authorized Officer:	CHIEF FINANCIAL OFFICER
Telephone number of Authorized Officer:	8028857745 ext.
Study Area Code of Reporting Carrier:	147332 Filing Due Date for this form: 07/01/2015
Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.	

TO BE COMPLETED BY THE AUTHORIZED AGENT:

Certification of Agent Authorized to File Annual Reports for CAF or LI Recipients on Behalf of Reporting Carrier	
I, as agent for the reporting carrier, certify that I am authorized to submit the annual reports for universal service support recipients on behalf of the reporting carrier; I have provided the data reported herein based on data provided by the reporting carrier; and, to the best of my knowledge, the information reported herein is accurate.	
Name of Reporting Carrier:	VERMONT TEL. CO-VT
Name of Authorized Agent or Employee of Agent:	JSI
Signature of Authorized Agent or Employee of Agent:	CERTIFIED ONLINE Date: 06/26/2015
Printed name of Authorized Agent or Employee of Agent:	Tanea Davis Foglia
Title or position of Authorized Agent or Employee of Agent:	Manager - Regulatory Affairs
Telephone number of Authorized Agent or Employee of Agent:	3014597590 ext.
Study Area Code of Reporting Carrier:	147332 Filing Due Date for this form: 07/01/2015
Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.	

REDACTED FOR PUBLIC INSPECTION

Attachments

REDACTED – FOR PUBLIC INSPECTION

ATTACHMENT - LINE 112

**Five-Year Network Improvement Plan and
Progress Report**

ATTACHMENT REDACTED IN ENTIRETY

Vermont Telephone Company, Inc.'s demonstration of complying with applicable service quality standards and consumer protection rules for voice and broadband services:

In establishing this certification in its *2005 ETC Order*,¹ the FCC found that an ETC must make "a specific commitment to objective measures to protect consumers."² The Commission found that for wireless ETCs, compliance with CTIA's Consumer Code for Wireless Service would satisfy this requirement" and that the sufficiency of other commitments would be considered on a case-by-case basis.³ In this context, the FCC stated, "to the extent a wireline or wireless ETC applicant is subject to consumer protection obligations under state law, compliance with such laws may meet our requirement."⁴

Vermont Telephone Company, Inc. ("Vermont Telephone") hereby certifies that it is complying with applicable service quality standards and consumer protection rules. Vermont Telephone Company, Inc. is subject to consumer protection obligations under state law. These obligations include, but are not limited to, the following: (1) filing a Local Exchange Tariff pursuant to the requirements of the Vermont Public Service Board (PSB) Rules 7.500 and 7.600, which discloses rates, terms and conditions of service to customers; (2) adherence to state consumer protection requirements governing telephone

¹ *Federal-State Joint Board on Universal Service*, CC Docket No. 96-45, Report and Order, FCC 05-46 (rel. Mar. 17, 2005) ("*2005 ETC Order*").

² *Id.* at para. 28.

³ *Id.* The FCC noted that under the CTIA Consumer Code, wireless carriers agree to: "(1) disclose rates and terms of service to customers; (2) make available maps showing where service is generally available; (3) provide contract terms to customers and confirm changes in service; (4) allow a trial period for new service; (5) provide specific disclosures in advertising; (6) separately identify carrier charges from taxes on billing statements; (7) provide customers the right to terminate service for changes to contract terms; (8) provide ready access to customer service; (9) promptly respond to consumer inquiries and complaints received from government agencies; and (10) abide by policies for protection of consumer privacy." *Id.* at n. 71.

⁴ *Id.* at n. 72.

providers as identified in Docket 5903, Attachment 2, Consumer Protection Standards, protection against cramming and other deceptive practices as identified in PSB Rule 4.700; (3) truth-in-billing requirements as identified in PSB Rule 4.700; and (4) CPNI, Red Flag Rules and other applicable federal and state requirements governing the protection of customers' privacy.

In addition, Vermont Telephone Company, Inc. certifies compliance with broadband specific consumer protection obligations under federal law. The federal law obligations include, but are not limited to, the following: public disclosure of accurate information regarding network management practices, performance, and commercial terms of broadband internet access services; as a means of providing sufficient information for consumers to make informed choices regarding use of such services, and for content, application, service and device providers to develop, market, and maintain internet offerings as specified in F.C.C. 47 C.F.R. Part 8 §8.3. The Company furthermore will comply with all requirements set forth in the *2015 Open Internet Order* when it becomes effective.

Vermont Telephone Company, Inc.'s Ability to Function in Emergency Situations for voice and broadband.

Vermont Telephone Company, Inc. ("Company") hereby certifies that it is able to function in emergency situations as set forth in the Code of Federal Regulations, Title 47, Part 54, Subpart C, §54.202(a)(2).¹ The Company's network is designed to remain functional in emergency situations without an external power source, is able to reroute traffic around damaged facilities, and is capable of managing traffic spikes resulting from emergency situations as required by Section 54.202(a)(2). The Company can change call routing translations as needed to reroute traffic around damaged facilities. Changing call routing translations will also allow the Company to manage traffic spikes throughout its network, as emergency situations require.

Specifically, each central office building is supplied with standby generators and battery back-up that enable the central office to keep running until power is restored so long as fuel is available, or until system changes are made to reroute traffic.

The Company's standby generators and battery back-up support both voice and broadband network equipment should an emergency situation occur.

¹ Section 54.202(a)(2) requires ETCs that are designated by the Commission to "demonstrate its ability to remain functional in emergency situations, including a demonstration that it has a reasonable amount of back-up power to ensure functionality without an external power source, is able to reroute traffic around damaged facilities, and is capable of managing traffic spikes resulting from emergency situations."

REDACTED FOR PUBLIC INSPECTION

(790) Price Offerings including Voice Rate Data
Data Collection Form

PCG Form 481

OMB Control No. 3060-0985 OMB Control No. 3060-0819

July 2013

<010>	Study Area Code	147332
<015>	Study Area Name	VERMONT TEL. CO-VT
<020>	Program Year	2016
<030>	Contact Name - Person USAC should contact regarding this data	Shannon Butler
<035>	Contact Telephone Number - Number of person identified in data line <030>	8028857707 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	sbutler@vermontel.com

<701> Residential Local Service Charge Effective Date
<702> Single State-wide Residential Local Service Charge

1/1/2015

<703>

[illegible]

REDACTED FOR PUBLIC INSPECTION

(710) Broadband Price Offerings
Data Collection Form

FCC Form 481
OMB Control No. 3060-0886/OMB Control No. 3060-0819
July 2013

<010>	Study Area Code	147332
<015>	Study Area Name	VERMONT TEL. CO-VT
<020>	Program Year	2016
<030>	Contact Name - Person USAC should contact regarding this data	Shannon Butler
<035>	Contact Telephone Number - Number of person identified in data line <030>	8028857707 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	sbutler@vermontel.com

[illegible]

REDACTED FOR PUBLIC INSPECTION

(800) Operating Companies
Data Collection Form

PCC Form 403
OMB Control No. 3060-0986/OMB Control No. 3060-0819
July 2013

<010>	Study Area Code	147332
<015>	Study Area Name	VERMONT TEL. CO-VT
<020>	Program Year	2016
<030>	Contact Name - Person USAC should contact regarding this data	Shannon Butler
<035>	Contact Telephone Number - Number of person identified in data line <030>	8028857707 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	sbutler@vermontel.com
<810>	Reporting Carrier	Vermont Telephone Company, Inc.
<811>	Holding Company	Vermont National Telephone Company, Inc.
<812>	Operating Company	Vermont Telephone Company, Inc.

[illegible]

Vermont P.S.B. No.1
Vermont Telephone Company

Section 4
Fourth Revised Sheet 14

4. LOCAL EXCHANGE TELEPHONE SERVICE

4.11 Lifeline Telephone Service / Vermont Universal Service Fund

400 JAN -7 A D: 51

4.11.1 Lifeline Telephone Service

Lifeline Telephone Service consists of a waiver of the monthly "Federal Subscriber Line Charge." In addition, there is a reduction equal to the greater of \$7.00 or 50% per month in the local exchange rate, including zone charges. These credits are effective with bills rendered on, or after the effective date of this tariff. In no event shall the basic monthly exchange charge be reduced below zero. (C)

This service is restricted to residential subscribers. To qualify for lifeline service rates, a subscriber must be income-eligible and must apply through the Vermont Department of Prevention, Assistance, Transition and Health Access or the Department of Taxes. The subscriber's name must then be provided to the Telephone Company by the Vermont Department of Prevention, Assistance, Transition and Health Access on a list of eligible participants. The list will be updated monthly and reconciled quarterly. Seasonal customers are ineligible for lifeline service. (C)

Vermont Universal Service Fund

All residence and business customers are subject to a Vermont Universal Service Fund surcharge. The surcharge is applied as a percentage (set by Vermont Department of Public Service and approved by Vermont Public Service Board) on most services contained in this tariff. Those services not subject to the surcharge are noted throughout the tariff. (C)

4.11.2 Responsibility of the Subscriber

Proof of eligibility for the Lifeline rate is provided to the Company by the Vermont State Department of Prevention, Assistance, Transition and Health Access. All questions of eligibility should be directed to the State Department of Prevention, Assistance, Transition and Health Access. (C)

4.11.3 Responsibility of the Telephone Company

The Company will reconcile quarterly the list of eligible telephone numbers within each local exchange. If a subscriber is identified as being ineligible, Lifeline rate treatment will be discontinued. The Telephone Company will not be held liable for errors in the identification of eligible customers. Its liability will be limited to reasonable and prudent handling of the information provided by the Department of Prevention, Assistance, Transition and Health Access. (C)

Vermont P.S.B. No. 1
Vermont Telephone Co., Inc.

4th
VERMONT PUBLIC
SERVICE BOARD

Section 4

Revised Sheet 22

Revised Sheet 22

4. LOCAL EXCHANGE TELEPHONE SERVICE

4.13 Non-Optional Measured Service

2002 JUN 14 A 11: 16

4.13.3 Rates (Cont'd)(C) Application of Local Usage Charges

- (1) Messages are billed on a per minute basis, with the time of connection determining the per minute rate. In the event that a minute of use is split between two rate periods, the rate in effect at the start of that minute applies. Peak and off-peak period time frames apply as specified below:

<u>Time Applicable</u>	<u>Mon</u>	<u>Tues</u>	<u>Wed</u>	<u>Thurs</u>	<u>Fri</u>	<u>Sat</u>	<u>Sun</u>

8:00 am to 8:00 pm						*****	

8:00 pm to 8:00 am	*****					*****	
	*****					*****	

(2) Local Usage Charges

<u>Per Minute</u>	
<u>Peak Period</u>	<u>Off-Peak Period</u>
\$0.022	\$0.005

(3) Caps On Local Usage Charges

The local usage charges in (2) above will be capped for calls and corresponding minutes made to all local call routes of the Company, including the home exchange.

The following usage caps will apply:

Residence, per line	\$25.00 per month	(C)
PlainTalk@Home, per line	\$15.00 per month	(C)
Business, per line (including PBX trunks)	\$35.00 per month	(C)
PlainTalk@Work, per line	\$15.00 per month	(C)

Usage caps will not apply to the following forms of service:

1. Public Pay Stations
2. Semi-Public Pay Stations
3. Public Access Lines (COCOTs)
4. Customer requested and Company provisioned multi-path remote call forwarding service to a pre-selected telephone number.

Issued: June 10, 2002
Effective: July 1, 2002

J. Michel Guité
President

01/24/96 04:46 FAX 802 885 4929

VTEL

2003

Vermont P.S.B. No. 1
Vermont Telephone Co., Inc.

Section 4
Second Revised Sheet 6

4. LOCAL EXCHANGE TELEPHONE SERVICE

4.8 Local Flat Rate Service Rates

4.8.1 Residential Flat Rate Service

(C)

4.8.1 Business Flat Rate Service

(C)

SCHEDULE A - RESIDENTIAL AND BUSINESS SERVICE

(N)

TELEPHONE RATE CLASSIFICATIONS

<u>Rate Group</u>	<u>Base Rate Area</u>	<u>Zone A</u>	<u>Zone B</u>	<u>Zone C</u>
Residence	\$12.70	\$13.90	\$16.30	\$19.90
Business	\$23.25	\$26.60	\$28.05	\$30.80

(N)

Issued: December 15, 1995

Effective: January 4, 1996

Issued in compliance with VT P.S.B. Docket #5670.

J. Michel Guité
President

Vermont P.S.B. No. 1
Vermont Telephone Co., Inc.

VERMONT PUBLIC
SERVICE BOARD

7th
Section 4
Revised Sheet 24
Cancels 6th Revised Sheet 24

4.14 VTel Plain Talk Service 2002 JUN 14 A 11:16

4.14.1 GENERAL

- (1) VTel Plain Talk Service is an optional local calling plan offered, subject to availability of facilities, as a supplement to one-party residence and business telephone exchange service.
- (2) This service provides for twenty hours of local calling from the customer's originating exchange to exchanges within the customer's local calling area as specified in Section 4.7. Message time in excess of the twenty hour allowance is charged for at the per minute rates shown in Section 4.13.3. Customers subscribing to Digital Subscriber Line (DSL) service will receive 8000 minutes of local calling when subscribed to Plain Talk Service. (T)
- (3) VTel Plain Talk Service rates apply only to customer-dialed station-to-station sent-paid calls when facilities are available for customer dial completion. The rates also apply to operator-completed station-station sent-paid calls for handicapped persons unable to dial calls because of their handicap. All other calls are charged for at the rates specified in Section 7.1.2. (T)
- (4) Accumulation of message time is done on a whole minute basis. Individual messages with fractional totals are rounded to the next higher minute.
- (5) There are no time of day restrictions with VTel Plain Talk Service.
- (6) VTel Plain Talk Service is not available for person-person, collect, charge to a calling card number, third party telephone number, conference or other calls which normally require an operator.
- (7) Subscribers to VTel Plain Talk Service may also subscribe to the Plain Talk Feature Package and are eligible for Plain Talk Additional Line discounts. Business and Residential packages and rates are set forth in Section 4.14.2 following. The calling allowance is applied in aggregate across all lines in the account subscribed to the Plain Talk Feature package.
- (8) Plain Talk subscribers who also have DSL service are eligible for the Additional Line discount with or without subscription to the ValuPak feature package.

4.14.2 RATES AND CHARGES

- (1) VTel Plain Talk Service is provided at the following rates, which are inclusive of rates and charges for associated one-party main telephone exchange service. This rate does not include associated services, as appropriate.
- (2) The one time charge as specified in Section 6.1.2.B applies when VTel Plain Talk Service is ordered subsequent to the installation of a network access line.

Issued: June 10, 2002
Effective: July 1, 2002

Michel Guité
President

Vermont P.S.B. No. 1
Vermont Telephone Co., Inc.

VERMONT PUBLIC
SERVICE BOARD
Section 4
1st Revised Sheet 24.1
Cancels Original Sheet 24.1
2002 JUN 14 A 11:16

4.14.2 RATES AND CHARGES (cont.)

- (3) During the period March 11, 2002 through December 31, 2002 the one time charge is waived when VTel Plain Talk Service is ordered subsequent to the installation of a network access line.

Local Dial Tone Plus	Residential	\$20.00 Monthly*
20 Hour Local Calling Allowance	Business	\$30.00 Monthly*
Local Dial Tone Plus DSL	Residential	\$20.00 Monthly*
8000 Minute Local Calling Allowance	Business	\$30.00 Monthly*

(T)
|
(T)

* Applicable whether or not calls are made. Each additional minute or fraction thereof charged at rates specified in Section 4.13.3.

- (4) ValuPak Feature Bundle – the following feature packages are available in conjunction with VTel Plain Talk Service for both primary and discounted Plain Talk Additional Lines.

ValuPak@Home	Call Waiting Conference Calling Return Call (*69) Repeat Dial TeenLine Call Trace Caller ID Name Caller ID Number Home Intercom Service No Receiver Off Hook Residential Call Hold	Call Forwarding Remote Access to Call Forwarding Call Forward Don't Answer Selective Call Forwarding Selective Call Acceptance Selective Call Rejection Anonymous Caller Rejection Priority Ringing/Call Waiting Speed Dialing Long Speed Dialing Short	\$2.00 Monthly
ValuPak@Work	Call Waiting Conference Calling Call Transfer Return Call (*69) Repeat Dial Distinctive Ringing Caller ID Name Caller ID Number Intercom Trunk Hunting Call Hold	Call Forwarding Remote Access to Call Forwarding Call Forward Don't Answer Selective Call Forwarding Selective Call Acceptance Selective Call Rejection Music On Hold Speed Dialing Long Speed Dialing Short Call Pick Up	\$2.00 Monthly

Issued: June 10, 2002
Effective: July 1, 2002

Michel Guité
President

Vermont Telephone Company, Inc. (SAC 147332)

Response to Line 3010 – Milestone Certification (47 CFR §54.313(f)(1)(i))

Vermont Telephone Company, Inc. hereby certifies that throughout 2014, it took reasonable steps to provide upon reasonable request broadband service at actual speeds of at least 4 Mbps downstream/1 Mbps upstream, and currently, it is taking reasonable steps to provide upon reasonable request actual speeds of at least 10 Mbps downstream/1 Mbps upstream broadband service at with latency suitable for real-time applications, including Voice over Internet Protocol, and usage capacity that is reasonably comparable to comparable offerings in urban areas as determined in an annual survey, and that requests for such service are met within a reasonable amount of time.

Vermont Telephone Company, Inc. (SAC 147332)

**Response to Line 3012 - List of Community Anchor Institutions to Which the ETC Newly
Began Providing Service**

The FCC's *USF/ICC Transformation Order* requires a listing of community anchor institutions to which the ETC newly began providing broadband service. Vermont Telephone Company did not newly begin providing community anchor institutions with access to broadband service in calendar year 2014.

REDACTED – FOR PUBLIC INSPECTION

ATTACHMENT - LINE 3017

ATTACHMENT REDACTED IN ENTIRETY